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AUSTIN M. THOMPSON (SB# 229924)
Attorneys for Defendant
FRANCISCO MIRANDA

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CASE NO.: 3:2020-CR-00452
)	
Plaintiff,)	DEFENDANT'S OPPOSITION TO UNITED
)	STATES MOTION TO REVOKE RELEASE
vs.)	ORDER AND TO EXTEND STAY OF
)	RELEASE
FRANCISCO MIRANDA,)	
)	
Defendant.)	
_____ /)	

Pretrial Services, after a careful assessment of defendant Francisco Miranda's criminal and personal history, as well as the nature of the charges in the present case, and the comments of the case agent, recommended that Mr. Miranda be released on a \$50,000 unsecured bond and with various conditions, including "Defendant must not travel outside of the Northern District of California". (See 12/24/20 Pretrial Services Report,) On December 28th, 2020, after hearing the evidence and argument from the Government, which included all of the same accusations made in their Motion to Revoke Release Order (Dkt. No. 31), the Honorable Sallie Kim, U.S. Magistrate Judge followed the recommendation of Pretrial Services and ordered defendant released on unsecured \$50,000 bond. (Dkt. No. 32)

1 Of course, under United States v. Koenig, 912 F.2d 1190, this court is to make it's own
2 independent judgement with regards to the magistrate's findings and make a "'de novo'
3 determination of the facts.." Id. at 1193. The factors to be considered in determining whether
4 there are conditions of release which will ensure the defendant's appearance and the safety of the
5 community are spelled out in 18 U.S.C. §3142(g). They include: (1) the nature and
6 circumstances of the offense; (2) the weight of the evidence against the person; (3) the history
7 and characteristics of the person, including family and community ties, employment, length of
8 residence, and prior criminal record, among others; and (4) the nature and seriousness of any
9 danger to the community posed by a release. Under these criteria, given the facts set forth below,
10 Mr. Miranda is a good candidate for pre-trial release.

11 Mr. Miranda is charged in the present case with Conspiracy to Distribute and Possess
12 with Intent to Distribute Cocaine, pursuant to Title 21, US Code, Section 846. There is no
13 indication from the discovery received thus far that Mr. Miranda used or threatened to use
14 violence or possessed firearms in connection with this alleged offense or at any other time.
15 According to the Pretrial Services Report completed on 12/24/2020, Mr. Miranda's prior history
16 consists of a single non-violent, drug-related conviction and deportation in 2010. His substantial
17 ties to the community include his four children, aged 12 years to 8 months, who are all U.S.
18 citizens and have lived in the U.S. their whole lives.

19 Under these circumstances, the Government cannot meet their burden. A 34-year-old with
20 a single criminal arrest, no history of violence, no failures to appear, and a potential bail package
21 that can directly address any hypothetical risks cannot be considered "the carefully limited
22 exception" requiring pretrial detention under the Bail Reform Act. United States v. Salerno, 481
23 U.S. 735, 755 (1987).

24 In upholding the Bail Reform Act, the Supreme Court explained that "in our society
25 liberty is the norm, and detention prior to trial or without trial is the carefully limited exception."
26 Salerno, 481 U.S. at 755. The Court cautioned that the Bail Reform Act should not be used by
27

1 the lower courts as "a scattershot attempt to incapacitate those who are merely suspected of these
2 serious crimes." *Id.* at 741. Accordingly, the Ninth Circuit has repeatedly emphasized that,
3 "only in rare circumstances should release be denied," *United States v. Motamedi*, 767 F.2d
4 1403, 1405 (9th Cir. 1985); see also *United States v. Honeyman*, 470 F.2d 473,474 (9th Cir.
5 1972) ("The whole spirit of the Bail Reform Act, 18 U.S.C. § 3146, et seq., is that a defendant
6 facing trial should be released, rather than detained, unless there are strong reasons for not
7 releasing him.").

8 The Bail Reform Act requires this Court to first evaluate, based on certain statutorily
9 specified criteria set forth at §3142(g), whether releasing Mr. Miranda on his own recognizance
10 is sufficient to reasonably assure (1) his appearance as required and (2) the safety of any other
11 person and the community. 18 U.S.C. § 3142(a). The burden of persuasion-to establish by clear
12 and convincing evidence that the defendant poses a risk of flight or particularized future threat to
13 a specific individual or community-remains at all times with the government. *United States v.*
14 *Gebro*, 948 F.2d 1118, 1121 (9th Cir. 1991) and *United States v. Hir*, 517 F.3d 1081, 1086 (9th
15 Cir. 2006). If the evidence cuts both ways and it is a close call, "[d]oubts regarding the propriety
16 of release should be resolved in favor of the defendant." *Motamedi*, 767 F.2d at 1405.

17 The Ninth Circuit has emphasized that "the weight of the evidence when coupled with the
18 presumption of innocence is, as a general rule, not particularly probative of the issues relevant at
19 a detention hearing," and as such, it is "the least important of the various factors" in the bail
20 review analysis. *Motamedi*, 767 F.2d at 1408; see also 18 U.S.C. 31420) ("nothing in this section
21 shall be construed as modifying or limiting the presumption of innocence"). Significantly, Mr.
22 Miranda's minimal criminal record; the fact that he has no history of violence or use or
23 possession of firearms; the fact that he has no known failures to appear; and the fact that he has
24 strong family support and a stable residence, coupled with his presumptively innocent status, all
25 outweigh any allegation of potential risk of flight or danger to the community.

1 1. Francisco Miranda's Limited Criminal History

2 As set forth in the December 24th, 2020 Pretrial Services report, Miranda's "Prior
3 Criminal Record" contains a single 2010 San Mateo County conviction on non-violent drug-
4 related charges, not involving firearms. It is also noted that, following his incarceration on that
5 conviction, Mr. Miranda was deported from the United States, in August, 2010. In September,
6 2011 a probation violation was alleged and a bench warrant issued, which is still active. He has
7 not suffered any arrest or conviction in over ten years.

8 The probation violation and bench warrant presumably arose from his failure to report
9 due to being deported, not any willful failure to appear. There is no indication in his records that
10 he has ever purposefully absconded. He has had no interaction with law enforcement for the past
11 10 years. He has no history of violence whatsoever. Furthermore, Mr. Miranda's only prior
12 criminal arrest was in state court. He has never been in the federal criminal justice system, and
13 has never been subject to supervision or subject to the many release conditions that are available
14 through Pretrial Services to mitigate any hypothetical risks.

15 2. Defendant's strong ties to the community

16 Mr. Miranda also has strong family support and roots in his community of residence
17 (Santa Clara, CA-in the Northern District of California). Mr. Miranda, his wife and family,
18 siblings and friends all reside locally. Though he is not native to California, he considers it
19 home.

20 Upon his release from custody, Mr. Miranda will return home to live with his wife Maria
21 Ledesma and their 3 sons -Ricardo, age 12, Francisco, age 8, and Santiago, 7 months. They have
22 lived in their current house in Santa Clara for the past eight months and for years before that they
23 resided nearby in East Palo Alto. Mr. Miranda has a close extended family network in
24 California's South Bay Area consisting of his sister Elizabeth Sanchez who lives in South San
25 Francisco, and brother Armando Miranda who lives in Santa Clara and their families.

1 The Government alleges that Mr. Miranda has been recorded stating that he will “leave to
 2 the motherland”, if he is apprehended by law enforcement. (U.S. Motion to Revoke Release
 3 Order, Dkt. No. 31, at 3) This allegation is misleading and inaccurate. The recorded
 4 conversation was about attendance at a cockfight. (Dkt. No. 13-1 at 3) The conversation is filled
 5 with name-calling and joking. (Id.) The statement attributed to Mr. Miranda: “Si me chingan ...
 6 pos me voy pa mi tierra?” is literally translated “If they f - k me, I will go to my land”. The
 7 Government’s interpretation of the statement is that if law enforcement catches him (again, in
 8 this context, it would be for attending a cock fight) he would *flee* to his homeland. (U.S. Motion
 9 to Revoke Release Order, Dkt. No. 31, at 3). However, even if they were talking about law
 10 enforcement apprehension, the statement, if made by Mr. Miranda, would more properly be
 11 interpreted to mean that he would be deported, given his previous experience in 2010. Thus, this
 12 statement does not reflect an intention to *flee* to Mexico.

13 Under these circumstances, the government's allegations in this case, serious as they may
 14 be, do not outweigh the many mitigating circumstances that strongly support Mr. Miranda's
 15 release on conditions. A 34-year-old with a single criminal arrest, ten years ago and no history of
 16 violence, especially one with Mr. Miranda's strong support network, cannot reasonably be
 17 characterized as the "carefully limited exception" requiring detention. Salerno, 481 U.S. at 755.

18 3. There are viable conditions of release that can mitigate any identified risks

19 Furthermore, the ultimate question is not whether there are risks associated with Mr.
 20 Miranda’s release, but whether there are conditions that can be fashioned that would reasonably
 21 assure Mr. Miranda's appearance and the safety of the community. See Hir, 517 F.3d at 1091-92
 22 (explaining that even where a defendant may pose a danger, the court still must release him if
 23 there are a combination of conditions that would reasonably assure the safety of the community);
 24 United States v. Scott, 450 F.3d 863, 874 (9th Cir. 2006) (cautioning that a district court can only
 25 impose conditions on release if they are necessary to address a defendant's demonstrated
 26 "heightened risk of misbehaving while on bail").

1 The government makes mention of the identification documents found in the
 2 investigation of Mr. Miranda which bore the name of someone else. (Dkt. No. 31 at 3-4) Those
 3 documents have been seized and are in the possession of law enforcement. In addition, Mr.
 4 Miranda will surrender any passports in his possession and abide by any condition set forth by
 5 this court such as not possessing documents in anyone else's name and not traveling outside of
 6 the Northern District of California. The Magistrate Judge already imposed the conditions that Mr.
 7 Miranda be subject to a curfew and GPS monitoring.

8 Under the aforementioned circumstances, the Government cannot meet its heavy burden
 9 of establishing that there are no conditions that will reasonably assure Mr. Miranda's
 10 reappearance in court. There are many additional conditions available even beyond those
 11 recommended by Pretrial Services that will further ensure that Mr. Miranda is abiding by the
 12 conditions of his release. Any concern by the government regarding recidivism can be adequately
 13 addressed by all of the aforementioned conditions.

14
 15 **II. SHOULD THE COURT FIND THAT THE GOVERNMENT HAS PRESENTED CLEAR**
 16 **AND CONVINCING EVIDENCE TO WARRANT MR. MIRANDA'S CONTINUED**
 17 **DETENTION, COMPELLING REASONS EXIST TO TEMPORARILY RELEASE MR.**
 18 **MIRANDA**

19 Mr. Miranda's ties to the community and proposed surety, and the mechanisms available
 20 through pretrial services to prevent illegal activity upon release, satisfy his burden that conditions
 21 of release exist to reasonably assure his appearance and the safety of any other person and the
 22 community. Should this court disagree, compelling reasons exist to temporarily release Mr.
 23 Miranda under 18 U.S.C. §3142(i).

24 Mr. Miranda suffers from diabetes as well as other pre-existing health conditions.

25 On November 18th, 2020 he was remanded into U.S. Marshall's custody at Santa Rita
 26 jail. As of the date of this filing, Santa Rita reported a population of 1866 inmates. The Alameda
 27 County Sheriff claims that currently there are SRJ has 50 positive inmate COVID-19 cases and
 28 15 current positive staff/contractor cases positive inmate COVID-19 cases. Those numbers have

1 increased dramatically in the past three weeks.

2 positive.(https://alamedacountysheriff.org/admin_covid19.php).

3 In this unprecedented time, all justice system partners are duty-bound to take action to
4 protect vulnerable populations and the community at large. COVID-19 is primarily spread from
5 person to person from respiratory droplets when an infected person coughs, sneezes, or talks or
6 by touching a surface or object that has the virus on it, and then by touching your mouth, nose, or
7 eyes. Given the conditions of Santa Rita Jail, it is nearly impossible to avoid the risk of infection.

8 Here, any potential risk of flight danger to the community posed by Mr. Miranda's release
9 can be addressed by the sureties available here, as well as any conditions set forth by this court,
10 including monitoring. However, nothing can address the dangers posed by the closed quarters of
11 the Santa Rita County Jail during COVID and the imminent threat to the inmates and the jail
12 staff. Balancing the potential harm of his continued pretrial incarceration against the potential
13 harm of his failing to appear at a future court hearing, it is clear that release with appropriate
14 conditions is necessary.

15 Inmates have long suffered inadequate medical care in Santa Rita. Two civil rights class
16 action lawsuits are currently pending in the Northern District of California alleging a lack of
17 adequate medical care, and a third class action lawsuit alleges a lack of mental health treatment.
18 See Mohrbacher et al v. Alameda County Sheriff's Office et al, 18-cv-00050 JD, (N.D CAL.)
19 (female inmate class action.); Gonzalez et al v. Ahern et al, 19-cv-07423 JSC, (N.D Cal.) (male
20 inmate class action); Babu et al v. Ahern et al, 18-cv-07677 NC (N.D. Cal). The complaints in
21 these cases paint a shocking picture of neglect and mistreatment, including inmates receiving no
22 medical attention while undergoing drug detox (Gonzalez, Dkt. No. 1 at ¶94), inmates being
23 denied lifesaving prescribed medication for weeks (Id. at ¶ 93), slow response times to medical
24 emergencies like seizures (Id. at ¶ 96), and unanswered requests for medical attention by
25 bedridden inmates (Mohrbacher, Dkt. No. 103 at ¶ 94). And these examples are not isolated
26 incidents; rather, they reflect a systemic problem at Santa Rita that will hinder the ability of
27

1 inmates with COVID-19 to receive adequate care. As of October 2019, Santa Rita had a 50%
2 higher death rate than the LA County jail system, the largest county jail system in the nation and
3 one six times larger than Santa Rita.

4 Given the inadequate medical care inmates experienced *before* COVID-19 pandemic, this
5 court cannot be confident Mr. Miranda will receive medical attention for his pre-existing medical
6 conditions, let alone if he is infected with COVID-19.

7 By contrast, if released to home confinement, Mr. Miranda could continue to see his
8 doctor to address his conditions and seek immediate emergency medical attention if he
9 experienced any onset or exacerbation of health problems due to COVID-19.

10 Given that Santa Rita has failed to provide adequate care or sanitary conditions to inmates
11 in the best of times, it is doubtful that Santa Rita will be able to limit the spread of COVID-19 in
12 the jail.

13 Other courts have released inmates where medical conditions exposed them to particular
14 risk of serious COVID-19-induced illnesses. See Matter of Extradition of Toledo Manrique, No.
15 19-MJ-71055 TSH, 2020 WL 1307109, at *1 (N.D. Cal. Mar. 19, 2020) (“The risk that this
16 vulnerable person will contract COVID-19 while in jail is a special circumstance that warrants
17 bail.”); United States v. Parmer, No. 18-CR-00267-RS-1, 2020 WL 2213467 (N.D. Cal. Apr. 14,
18 2020) (Granting temporary pretrial release to 55 year old defendant with acute need to prepare
19 for imminent trial); United States v. Daniels, No. 19-CR-00709-LHK (NC), 2020 WL 1815342
20 (N.D. Cal. Apr. 9, 2020) (granting temporary pretrial release to defendant with obesity, previous
21 head wounds, and post-traumatic stress disorder); United States v. Garcha, No.
22 19CR00663EJD1VKD, 2020 WL 1593942 (N.D. Cal. Apr. 1, 2020) (granting temporary pretrial
23 release to defendant who is HIV-positive, has a brain tumor, and suffered a pulmonary
24 embolism).

25 We ask that, if the court does not find clear and convincing evidence to warrant Mr.
26 Miranda’s pretrial release in this case, it must exercise its discretion under 18 U.S.C. §3142(i)

1 and grant temporary release for the compelling reasons stated above.

2 CONCLUSION

3 For all the foregoing reasons, Mr. Miranda should not be detained, as there are a
4 combination of conditions which can ensure his attendance in court and will protect the interests
5 of the community. In the alternative, the court should grant temporary release given Mr.
6 Miranda's medical conditions and the COVID pandemic.

7
8 Dated: December 30, 2020

Respectfully Submitted,

9
10 /S/JESSE J. GARCIA
11 JESSE J. GARCIA
12 Attorney for Defendant
13 FRANCISCO MIRANDA
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FRANCISCO MIRANDA

IN THE UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,)	CASE NO.: 3:2020-CR-00452
)	
Plaintiff,)	DECLARATION OF AUSTIN M. THOMPSON
)	IN SUPPORT OF DEFENDANT'S OPPOSITION
vs.)	TO UNITED STATES' MOTION TO REVOKE
)	RELEASE ORDER
FRANCISCO MIRANDA,)	
)	
Defendant.)	
	/)	

I, Austin M. Thompson declare as follows:

- 1) Attached as Exhibit "1" please find a copy of prescriptions given to defendant, Francisco Miranda from his doctor in Mexico with regards to his diabetes and high blood pressure ("Metformina" (Metformin), "Glibenclamida" (Glibenclamide), and "Lozartan" (Losartan).
- 2) Attached as Exhibit "2" please find a copy of four (4) Certificate of Titles's offered by Francisco's family as potential sureties.

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge and belief.

1 Executed this 30th day of December 2020, in the City of Pleasanton, State of California.

2
3 /S/AUSTIN M. THOMPSON
4 Austin M. Thompson
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EXHIBIT “1”



Dr. Luis Alvaro Barbosa Santos

MEDICINA GENERAL

Av. Quinceo Núm. 641-B • Col. Mariano Escobedo • C.P. 58116 • Morelia, Mich. Ced. Prof. 6101208

Paciente:

Rx.

Francisco R Sanchez Miranda

Fecha:

02/10/19

Proxima Cita:

02/12/19

Favor de presentar esta
receta en su proxima consulta

Edad 33

II Cojos de Metformina tab

tomar 1 tab ~~4~~ 4 H.

Peso 94

Pulso

T/A ~~160~~ 98

Glibenclamide tab tomar 1 ~~2~~ 4 H

Talla

Temp. 36

la zar fan tab tomar 1 tab ~~1~~ 2 H



Farmacias (MG)
Mercado de genéricos

Firma



Dr. Luis Alvaro Barbosa Santos

MEDICINA GENERAL

Av. Quinceo Núm. 641-B • Col. Mariano Escobedo • C.P. 58116 • Morelia, Mich. Ced. Prof. 6101208

Paciente:

Rx. Francisco R Sanchez Miranda

Fecha:

04/05/20

Proxima Cita:

03/08/20

Favor de presentar esta
receta en su proxima consulta

Edad 34

Peso 93

Pulso 85

T/A 162/80

Talla

Temp. 36.5

cajas de Metformina 1g 850 mg
tomar 1 tg 24 hr por los noches

cajas de glihenclavida 1g tomar 1 tg
24 hr por los mañanas

Lozorlan 1g tomar 1 tg 12 hr



Farmacias (MG)
Mercado de genéricos

Firma



Dr. Luis Alvaro Barbosa Santos

MEDICINA GENERAL

Av. Quinceo Núm. 641-B • Col. Mariano Escobedo • C.P. 58116 • Morelia, Mich. Ced. Prof. 6101208

Paciente:

Rx.

Francisco R Sanchez Miranda

Fecha:

02/12/19

Proxima Cita:

04/02/20

Favor de presentar esta
receta en su proxima consulta

Edad 33

Peso 94

Pulso 100

T/A 165/90

Talla 1.65

Temp. 36.5

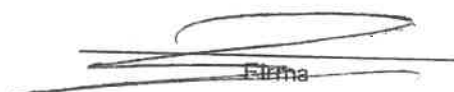
II glibenclamida 1/2 tableta

Metformina 850 mg tomar 1 tableta

Losartan 1/2 tableta



Farmacias (MG)
Mercado de genéricos


Firma



Dr. Luis Alvaro Barbosa Santos

MEDICINA GENERAL

Av. Quinceo Núm. 641-B • Col. Mariano Escobedo • C.P. 58116 • Morelia, Mich. Ced. Prof. 6101208

Paciente:

Rx. Francisco R Sanchez Miranda

Fecha: 04/02/20

Codos de Metformina 850 mg + 1/2
tomar 1 + 1/2 24 hr

Proxima Cita:

04/05/20

Favor de presentar esta
receta en su proxima consulta

Edad 34

Peso

Pulso 80

T/A 165

Talla

Temp. 36.7

Codos de Glibenclonida + 1/2
tomar 1 + 1/2 24 hr

Lozartan + 1/2 tomar 1 + 1/2 24 hr



Farmacias (MG)
Mercado de genéricos

Firma



Dr. Luis Alvaro Barbosa Santos

MEDICINA GENERAL

Av. Quinceo Núm. 641-B • Col. Mariano Escobedo • C.P. 58116 • Morelia, Mich. Ced. Prof. 6101208

Paciente:

Rx.

Francisco R Sanchez Miranda

Fecha:

03/08/20

Proxima Cita:

05/10/20

Favor de presentar esta
receta en su proxima consulta

Edad

34 años ~~24~~

Peso

85

Pulso

95

T/A

150/90

Talla

Temp.

36.5

metformina 1h 850 mg tomar

gliben clonida 1h tomar 1th ~~24~~

lozartan 1h tomar 1th ~~12~~

Deabion 1h tomar 1th ~~24~~



Farmacias (MG)
Mercado de genéricos

Firma

EXHIBIT “2”

STATE OF CALIFORNIA

CERTIFICATE OF TITLE

VEHICLE HISTORY

VE1200915PT

AUTOMOBILE

VEHICLE ID NUMBER

2HGFC2F51JH529200

YR
MODEL

2018 HOND

MAKE

PLATE NUMBER

8BJB768

REGISTRATION
EXPIRATION DATE

05/22/2021

BODY TYPE MODEL

4D

AX UNLADEN
WEIGHT

FUEL TRANSFER DATE

G 05/22/20

FEES PAID

\$822

YR 1ST
SOLD

2018 AD

CLASS

YR

2020

MO

BI

EQUIPMT/TRUST NUMBER

ISSUE DATE

09/15/20

MOTORCYCLE ENGINE NUMBER

ODOMETER DATE

05/22/2020

ODOMETER READING

70258 MI

REGISTERED OWNER(S)

SANCHEZ MIRANDA MIRIAM
936 BAY RD
E PALO ALTO CA 94303

ACTUAL MILEAGE

I certify (or declare) under penalty of perjury under the laws of the State of California that THE SIGNATURE(S) BELOW RELEASES INTEREST IN THE VEHICLE.

1a

DATE

X

SIGNATURE OF REGISTERED OWNER

1b

DATE

X

SIGNATURE OF REGISTERED OWNER

Federal and State law requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

The odometer now reads 70258 (no tenths), miles and to the best of my knowledge reflects the actual mileage unless one of the following statements is checked. Mileage is VOID if altered or erased.

WARNING ☐ Odometer reading is not the actual mileage. ☐ Mileage exceeds the odometer mechanical limits.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATE	TRANSFEROR/SELLER SIGNATURE(S)	DATE	TRANSFeree/BUYER SIGNATURE(S)
	X		X
PRINTED NAME OF SELLER OR AGENT SIGNING FOR A COMPANY		PRINTED NAME OF BUYER OR AGENT SIGNING FOR A COMPANY	

IMPORTANT READ CAREFULLY

Any change of Lienholder (holder of security interest) must be reported to the Department of Motor Vehicles within 10 days.

LIENHOLDER(S)

2. X

Signature releases interest in vehicle. (Company names must be countersigned)

Release Date

CA198779464
019460

REG. 17.30RS (REV.02/2016)

KEEP IN A SAFE PLACE - VOID IF ALTERED

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.

STATE OF CALIFORNIA

CERTIFICATE OF TITLE

VEHICLE HISTORY

VA1180421EN

AUTOMOBILE

VEHICLE ID NUMBER

WVWMP7AN2CE503262

YR
MODEL

MAKE

2012 VOLK

PLATE NUMBER

8DGF870

BODY TYPE MODEL

4D

AX UNLADEN
WEIGHT

FUEL TRANSFER DATE

G 04/20/18

FEES PAID

\$274

REGISTRATION
EXPIRATION DATE

06/14/2019

YR 1ST
SOLD

CLASS

YR

MO

EQUIPMT/TRUST NUMBER

2011 AH 2018 ZR

ISSUE DATE

04/21/18

MOTORCYCLE ENGINE NUMBER

ODOMETER DATE

04/20/2018

ODOMETER READING

114821 MI

ACTUAL MILEAGE

REGISTERED OWNER(S)

SANCHEZ MIRANDA ARMANDO
15970 EL CAPITAN WAY
DELHI CA 95315

I certify (or declare) under penalty of perjury under the laws of the State of California that THE SIGNATURE(S) BELOW RELEASES INTEREST IN THE VEHICLE.

1a

DATE

X

SIGNATURE OF REGISTERED OWNER

1b

DATE

X

SIGNATURE OF REGISTERED OWNER

Federal and State law requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

The odometer now reads 114821 (no tenths), miles and to the best of my knowledge reflects the actual mileage unless one of the following statements is checked. Mileage is VOID if altered or erased.

WARNING ☐ Odometer reading is not the actual mileage. ☐ Mileage exceeds the odometer mechanical limits.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATE	TRANSFEROR/SELLER SIGNATURE(S)	DATE	TRANSFeree/BUYER SIGNATURE(S)
	X		X
PRINTED NAME OF SELLER OR AGENT SIGNING FOR A COMPANY		PRINTED NAME OF BUYER OR AGENT SIGNING FOR A COMPANY	

IMPORTANT READ CAREFULLY

Any change of Lienholder (holder of security interest) must be reported to the Department of Motor Vehicles within 10 days.

LIENHOLDER(S)

2. X

Signature releases interest in vehicle. (Company names must be countersigned)

Release Date

CA180728965
006946

REG. 17.30RS (REV.02/2016)

KEEP IN A SAFE PLACE - VOID IF ALTERED

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.

STATE OF CALIFORNIA

CERTIFICATE OF TITLE

VEHICLE HISTORY

V71200924PF

AUTOMOBILE

SALVAGED

VEHICLE ID NUMBER

YR
MODEL

MAKE

PLATE NUMBER

WDC064JB6JV063475

2018 MERZ

8SIL717

BODY TYPE MODEL

AX UNLADEN
WEIGHT

FUEL TRANSFER DATE

FEES PAID

REGISTRATION

UT

G 09/23/20

\$473

03/10/2021

YR 1ST
SOLD

CLASS

YR

MO

EQUIPMT/TRUST NUMBER

ISSUANCE DATE

2018 BE 2020 BI

09/24/20

MOTORCYCLE ENGINE NUMBER

ODOMETER DATE

ODOMETER READING

09/23/2020

30000 MI

NOT ACTUAL MILEAGE

REGISTERED OWNER(S)

LEDESMA MARIA DE LOSANGELES
2601 CORTEZ DR
UNIT 1205
SANTA CLARA CA 95051

I certify (or declare) under penalty of perjury under the laws of the State of California that THE SIGNATURE(S) BELOW RELEASES INTEREST IN THE VEHICLE.

1a

DATE

X

SIGNATURE OF REGISTERED OWNER

1b

DATE

X

SIGNATURE OF REGISTERED OWNER

Federal and State law requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

The odometer now reads 30000 (no tenths), miles and to the best of my knowledge reflects the actual mileage unless one of the following statements is checked. Mileage is VOID if altered or erased.

WARNING ☐ Odometer reading is not the actual mileage. ☐ Mileage exceeds the odometer mechanical limits.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATE

TRANSFEROR/SELLER SIGNATURE(S)

DATE

TRANSFeree/BUYER SIGNATURE(S)

X

X

PRINTED NAME OF SELLER OR AGENT SIGNING FOR A COMPANY

PRINTED NAME OF BUYER OR AGENT SIGNING FOR A COMPANY

IMPORTANT READ CAREFULLY

Any change of Lienholder (holder of security interest) must be reported to the Department of Motor Vehicles within 10 days.

LIENHOLDER(S)

2. X

Signature releases interest in vehicle. (Company names must be countersigned)

Release Date

018960 CA199023332

REG 17 30RS (REV 02/2016)

KEEP IN A SAFE PLACE - VOID IF ALTERED

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.

STATE OF CALIFORNIA

CERTIFICATE OF TITLE

VEHICLE HISTORY

VA1170329EN

AUTOMOBILE

VEHICLE ID NUMBER

WAUFFAFLXBAD93815

BODY TYPE MODEL

4D

YR
MODEL

MAKE

2011 AUDI

PLATE NUMBER

7WIN007

REGISTRATION
EXPIRATION DATE

02/14/2018

ISSUE DATE

03/29/17

YR 1ST
SOLD

CLASS

YR

MO

EQUIPMT/TRUST NUMBER

2011 AC 2017 YP

G 03/28/17

\$70

MOTORCYCLE ENGINE NUMBER

ODOMETER DATE

ODOMETER READING

03/28/2017

100000 MI

ACTUAL MILEAGE

REGISTERED OWNER(S)

SANCHEZ MIRANDA ARMANDO
15970 EL CAPITAN WAY
DELHI CA 95315

I certify (or declare) under penalty of perjury under the laws of the State of California that THE SIGNATURE(S) BELOW RELEASES INTEREST IN THE VEHICLE.

1a

DATE

X

SIGNATURE OF REGISTERED OWNER

1b

DATE

X

SIGNATURE OF REGISTERED OWNER

Federal and State law requires that you state the mileage upon transfer of ownership. Failure to complete or providing a false statement may result in fines and/or imprisonment.

The odometer now reads 100000 (no tenths), miles and to the best of my knowledge reflects the actual mileage unless one of the following statements is checked. Mileage is VOID if altered or erased.

WARNING ☐ Odometer reading is not the actual mileage. ☐ Mileage exceeds the odometer mechanical limits.

I certify (or declare) under penalty of perjury under the laws of the State of California that the foregoing is true and correct.

DATE

TRANSFEROR/SELLER SIGNATURE(S)

DATE

TRANSFeree/BUYER SIGNATURE(S)

X

X

PRINTED NAME OF SELLER OR AGENT SIGNING FOR A COMPANY

PRINTED NAME OF BUYER OR AGENT SIGNING FOR A COMPANY

IMPORTANT READ CAREFULLY

Any change of Lienholder (holder of security interest) must be reported to the Department of Motor Vehicles within 10 days.

LIENHOLDER(S)

2. X

Signature releases interest in vehicle. (Company names must be countersigned)

Release Date

CA172382602

016823

REG. 17.30RS (REV.02/2016)

KEEP IN A SAFE PLACE - VOID IF ALTERED

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.

VOID WITHOUT BEAR WATERMARK. HOLD TO LIGHT TO VIEW.